

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, *et
al.*,
Debtors.

PROMESA
Title III
No. 17 BK 3283
(Jointly Administered)

**Opposition to Debtor's Omnibus Objection
"Five Hundred Twenty-Seventh"(substantive).**

To the Honorable United States District Court Judge Laura Taylor Swain:

NOW COME: Cruz Lorenzana, Sara (Claim No. 83256), who is judgment claimants in the case of Carmen Socorro Cruz Hernandez Plaintiffs Group, case No. K AC 1991-0665, through the undersigned attorney and states as follows:

1. On September 16, 2022, the Financial Oversight and Management Board for Puerto Rico, as Representative of the Commonwealth of Puerto Rico, filed the "Five Hundred Twenty - Seventh Omnibus Objections" (Substantive) seeking to disallow individual claims listed on Exhibit A of the reference omnibus objections by asserting that the claims included in referenced motion are not named plaintiffs in the litigation they asserts and seeks the Court Approval for the dismissal of the claim
2. That the Five Hundred Twenty - Seventh Omnibus Objection" is premised solely in the declaration Jay Herriman who as a Managing Director of A&M, and is one of the persons responsible for overseeing the claims reconciliation and objection process in the Debtors' cases filed under PROMESA.

3 That although Mr. Herriman asserts in his declaration, that to the best of his knowledge and belief, the information contained in the Five Hundred Twenty-Seven Omnibus Objection and exhibits to it are true and correct, and the relief requested therein is in the best interests of the Debtors and their creditors, at paragraph 5, erroneously states that the names of the claimants associated with the Claims to Be Disallowed and which claims are identified in Exhibit "A" do not appear in the charts or captions included in the Agosto Maldonado Master Claim or Judgment and that the claimants are therefore not plaintiffs in the mentioned litigation, said statement is inaccurate. Specifically, because claim No. 83256, filed on behalf Mrs. Cruz Lorenzana, Sara, does not state that she is a plaintiff in Agosto Maldonado Group litigation, but instead, is a judgment claimant in the case of Carmen Socorro Cruz Hernandez Plaintiffs Group, case No. K AC 1991-0665.

5. Based on the above facts, the appearing claimant includes in opposition to the Mr. Herriman declaration and request of dismissal or disallowance of claim No. 83256, a copy of the claim of reference and of the certified translation of the Carmen Socorro Cruz Hernandez judgment, where this Court can easily verify that information provided in the Five Hundred Twenty - Seventh omnibus objection, and Exhibit A is inaccurate. Particularly, because the Objection of reference, do not fit the proposed allegations, as the claim concerns the Cruz Hernandez group litigation and Mrs. Cruz – Lorenzana have a final judgment in her favor.

WHEREFORE, in view of the above, it is respectfully requested that this Honorable Court dismiss with prejudice the Five Hundred Twenty-Seventh Omnibus Objection concerning the individual claim above identified, as the Oversight Board's failed to present accurate facts and verifiable evidence to sustain its allegations regarding the dismissal of Mrs. Cruz Lorenzana claim and instead, guarantee the proper and just adjudication of Movant's claim and grant such other and further relief as the Court deems just and necessary.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, on October, 3, 2022.

IT IS HEREBY CERTIFIED, that on this same date we have electronically filed the Foregoing motion with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all counsels of record.

By /s/ Ivonne González Morales
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